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Pacific Workers'

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ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

October 26, 2019

Ms. Iana Zadneprovskaja
Farber & Company
333 Hegenberger Road, Suite 504
Oakland, CA 94621

Re: **Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC**

WCAB No: ADJ12031731
Claim No: 040519008736
Case Status: Off-calendar

Dear Ms. Zadneprovskaja:

As you know I took Applicant's Deposition at your office on October 10, 2019 and you kindly hand-delivered your Labor Code Section 5710 Deposition Fee demand while at the Deposition. I reviewed the same for reasonableness and note that the \$1,190.00 is reasonable and as such I will recommend payment to my client at that amount. I will also have my client issue \$12.00 to Applicant for his BART and bus fees.

As you are also aware, I will again write to Primary Treating Physician Dr. Jamasbi and indicate that although he will not control indemnity, he is entitled to comment on the same. Also enclosed herein please find the October 13, 2019 authorization for Dr. Jamasbi and I will be sure to serve him with that as well.

Once you receive the replacement Panel QME List please forward it to my attention and please note that as we discussed I would proactively agree to a waiver of the 60 to 90-day requirement that way we can finally get an examination set. If I receive AME authority for Dr. Leonard Gordon, I will also contact you.

Thank you for your attention to this matter.

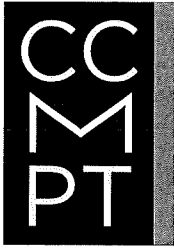
Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY: JAMES J. GOINES

JJG/aa

cc: Mr. Mario Castro / Chubb Group of Insurance Companies



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ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

October 26, 2019

Dr. Babak Jamasbi
2000 Van Ness Avenue, Suite 402
San Francisco, CA 94109

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No: ADJ12031731
Claim No: 040519008736
Case Status: *Off-calendar*

Dear Dr. Jamasbi:

As you are aware this office represents Defendants in the above-referenced matter and I most recently sent you a letter dated September 16, 2019.

Based on the discussion with Applicant's attorney on October 10, 2019, I agreed to add some language to that initial letter. Please note that although Applicant was released by prior Primary Treating Physician Dr. O'Lang on May 28, 2019 without the need for future medical, there was a need for permanent work restrictions. Thus the Tenet decision does not apply. Although you will not control indemnity you are entitled to comment on the same.

Also, enclosed herein please find the October 13, 2019 authorization for you to serve as the Primary Treating Physician and the parties kindly request that you serve all reporting as usual.

Thank you for your attention to this matter.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY: JAMES J. GOINES

JJG/aa

Encl.: Copy of Authorization dated 10/13/19

cc: Ms. Iana Zadneprovskaja / Farber & Company
Mr. Mario Castro / Chubb Group of Insurance Companies